

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

BRIGHT CAPTURE LLC,

Plaintiff,

v.

ZOHO CORPORATION,

Defendants.

Case No. 6:22-cv-48

**JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff Bright Capture LLC and Defendant Zoho Corporation jointly submit this Joint Claim Construction Statement for disputed claim terms of four patents that Bright Capture asserts Zoho infringes: (1) U.S. Patent No. 7,746,510; (2) U.S. Patent No. 8,693,070; (3) U.S. Patent No. 10,049,410; and (4) U.S. Patent No. 10,453,151.

**I. AGREED CONSTRUCTIONS**

Pursuant to the scheduling order, the Parties met and conferred on February 8, 2023, in an effort to narrow the terms in dispute. Through that process, the parties agreed that the preamble of claim 1 of U.S. Patent No. 8,693,070 should be construed as limiting. (This issue was proposed for construction by Zoho.)

**II. DISPUTED CLAIM TERMS**

Claim Term	Bright Capture's Proposed Construction	Zoho's Proposed Construction
"scanner" ('510 patent claim 11; '070 patent claim 1; and '151 patent preamble <sup>1</sup> )	Plain and ordinary meaning	"a portable device with a built-in feeder that scans documents as they are fed into the device"

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<sup>1</sup> The parties dispute whether the preamble is limiting.

This term was proposed for construction by Zoho.		
“Computer input device” (‘410 patent claim 1)  This term was proposed for construction by Zoho.	Plain and ordinary meaning	“a portable device with a built-in feeder that scans documents as they are fed into the device”
Preamble of claim 16 of U.S. Patent No. 10,453,151  This issue was proposed for construction by Zoho.	Not limiting	Limiting

This 6th day of April, 2023.

/s/ Cortney S. Alexander

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